

January 6, 2005

Charles Reynolds, Mine Manager
Co-Op Mining Company
P.O. Box 1245
Huntington, Utah 84528

Re: Lead Monitoring at Site SBC-9A, Co-Op Mining Company, Bear Canyon Mine, C/015/0025, Task #2081, Outgoing File

Dear Mr. Reynolds:

On January 14, 2003, a 130 ft x 20 ft x 20 ft roof fall in the 1st North section of the Bear Canyon #1 Mine (Hiawatha seam) buried a battery-powered coal hauler, an electrical distribution box, and a shop trailer. After MSHA and the Permittee investigated the roof fall, all remaining equipment was removed from the section and the area was sealed with MSHA approved mine seals.

The permittee notified the Division concerning the incident on January 15, 2003 during the regular monthly inspection. An amendment was submitted for the abandonment of waste underground, i.e., the mining equipment. The amendment received final approval on August 16, 2004.

In a letter dated June 4, 2004, Darrel B. Leamaster, District Manager for the Castle Valley Special Service District (CVSSD), notified the Division that they had written the EPA to express concerns about the abandoned equipment. Of particular concern was the 8,768 lbs of lead in the batteries and its proximity to Big Bear Spring. On August 4, 2004, the Division met with representatives of CVSSD and other water users, the Division of Drinking Water (DDW), and the Permittee to discuss this and related issues.

As result of that meeting and further consideration of potential problems with water quality-for both the mine and other water users, the Division concluded that the Bear Canyon Mine water-monitoring plan needed to be amended. In a letter dated August 27, 2004, the Division requested that Bear Canyon Mine amend the MRP to add quarterly analysis for lead and copper for water samples from the mine's culinary water supply at SBC-9A, the #1 Mine Portal pipe discharge from the Hiawatha Seam, and SBC-4 (Big Bear Spring). The amendment was also to include a written description of the installation of a 6-inch diameter pipeline along the mine floor to continuously drain ground-water inflow from the area of the abandoned mine equipment, and appropriate as-built drawings to show the location and routing of the

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pipeline and a typical cross-section of the cribbed pipeline installation.

The Permittee addressed most of these issues in the amendment received November 26, 2004. Copper was not added to the MRP operational parameters for SBC-9A and SBC-4, and the Division is no longer requesting additional, quarterly monitoring for copper at these sites: note, however, that the issue of analyzing the water for copper will be reopened if new information indicates that monitoring of this parameter is necessary or beneficial.

There is one deficiency that needs to be resolved before this amendment is approved.

Findings:

R645-301-731, Because there are clear concerns regarding potential impacts from 8,768 lbs of lead in the batteries abandoned near the protection zone for Big Bear Spring, the Permittee needs to monitor Big Bear Spring (SBC-4) quarterly for dissolved lead.

Enclosed is a copy of the December 30, 2004, TA. If you have any questions, please feel free to call me at (801) 538-5286 or Jim Smith at (801) 538-5262.

Sincerely,

D. Wayne Hedberg
Permit Supervisor

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Enclosure – TA
cc: Price Field Office
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